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DATE: March 6, 2014

FROM: Michael Keyser

CEO & General Manager

TO: The Honorable Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

Wireline Competition Bureau

RE: Expression of Interest of BARC Electric Cooperative

WC Docket No. 10-90/Connect America Fund (CAF)

Background on BARC Electric Cooperative

BARC is a *customer-owned* electric utility serving a population of over 30,000 across five Virginia counties. BARC owns and operates 2,000 miles of electric transmission and distribution line along its rights-of-way. BARC's service territory is, in part, rugged and mountainous. It is also vast, encompassing almost 1,500 square miles, from the top of the Blue Ridge Mountains, into the Shenandoah Valley, and all the way to the West Virginia border. We are just three hours from downtown Washington, D.C.

As mentioned in our prior docket filing, BARC's service territory is among the most unand under-served areas in all of Virginia. According to the Virginia Information Technologies Agency (VITA), approximately 67% of census blocks do not have access to broadband internet. Of those few that do have broadband access, DSL is their sole option.

Each month, we survey a sampling of our customer-owners on their satisfaction, and our scores average over 90%. Not surprisingly, the single greatest request of our customers is for BARC to provide broadband internet service.

Our Project

In response to customer demand, in 2013, we hired Byers Engineering (Atlanta, GA) to design and engineer a fiber-to-the-premises (FTTx) project that leverages our existing rights-of-ways and electric infrastructure. Backed by a redundant 275-mile core fiber ring to each of our substations, this project will connect over 10,000 anchor, commercial, industrial and residential structures with fiber. Where available, we intend to leverage the existing open-access fiber of the Rockbridge Area Network Authority (RANA), a BTOP grant recipient. Because our core ring

connects each of our substations, we will be able to utilize it for several smart grid applications, including secure IP meter reading and demand response.

Our FTTx network is scalable and capable of providing gigabit service to every home or business. We plan to offer bundled and unbundled plans. Below is a table of our initial *bundled* internet and telephone plans (also available unbundled):

Residential High-Speed Internet Service + Voice (unlimited local & long distance)

Starter: Up to 20 Mbps download and 10 Mbps upload

\$79.95/month

Basic: Up to 30 Mbps download and 10 Mbps upload

\$89.95/month

Advanced: Up to 110 Mbps download and 20 Mbps upload

\$129.95/month

1-Gig: Up to 1 Gbps download and 50 Mbps upload

\$189.95/month

Business High-Speed Internet Service + Voice (unlimited local & long distance)

Silver: Up to 20 Mbps download and 20 Mbps upload

\$129.95/month

Gold: Up to 50 Mbps download and 40 Mbps upload

\$179.95/month

Platinum: Up to 250 Mbps download and 40 Mbps upload

\$249.95/month

1-Gig: Up to 1 Gbps download and 50 Mbps upload

\$349.95/month

Nearly our entire electric service footprint qualifies as an eligible high-cost area. Based on the data provided by the FCC, our service area encompasses 7 eligible census tracts out of a total of 10 census tracts that we serve in total. Our customer-owners are *by definition* who Connect America Fund dollars are meant to benefit. For a summary of anchor institutions, community support facilities, and other customers to be served, please see the attached <u>Customer Profile</u>.

ROCKBRIDGE COUNTY, VA – 4 eligible census tracts (entire county) 51-163-9301; 9302; 9303; 9304

BATH COUNTY, VA – 1 eligible census tract (entire county) 51-017-9201

AUGUSTA COUNTY, VA – 1 eligible census tract 51-015-0701

ALLEGHANY COUNTY, VA – 1 eligible census tract 51-005-0803-01

Our FTTx deployment includes all of Bath and Rockbridge counties, as well as parts of Alleghany, Augusta, and Highland counties. As a local community organization, we have developed strong relationships with our local, state and federal government leaders, who are very supportive of our project (*see attached Letter of Support*).

Project At-A-Glance

Assuming a conservative take rate of 30%, we need \$15,000,000 (\$1,207 per passing) to fully fund this project. This amount is *less* than 10 years of the annual subsidies suggested by the Connect America Cost Model (CACM). This is due to the fact that we have the existing infrastructure, ownership of the ROWs and poles, existing billing relationships, and not-for-profit mission. In short, because we are an electric cooperative, we can execute delivery of broadband more efficiently and effectively with less supplementary funding than others might need. We view our need for supplemental project funds as a one-time capital expenditure subsidy. Our financial model does not factor in any ongoing subsidies from the FCC.

We chose FTTx for its scalability and potential impact on the future economic development of the community we serve.

We intend to finance our core substation ring through an electric work plan loan in the amount of \$16,607,770 from the USDA Rural Utilities Service (USDA-RUS). We would like to fund the remainder of the capital expense through a combination of Connect America Fund dollars and other RUS or private financing.

Services provided: Fiber-to-the-premises, voice (IPTV – TBD)

Pop. served: 30,000+ Line miles: 2,000

 Total cost:
 \$72,090,822

 BARC investment:
 \$16,607,770

 FCC investment:
 \$15,000,000

 Additional BARC financing:
 \$40,483,052

Attachments:

Customer Profile
Letter of Support (Representative Bob Goodlatte)

For More Information:

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BARC ELECTRIC COOPERATIVE

CUSTOMER PROFILE

	Members	Meters	Comments
Residential	9,404	11,809	
Commercial Rate Classes:			
Educational - Elementary	2	3	Rockbridge, Millboro, and Valley
Educational - Middle	1	1	Rockbridge Middle School
Educational - High School	1	3	Bath County High School
Educational - University	1	3	Virginia Military Institute
Health Care	1	9	Bath County Hospital System
Federal, State & Local Government	21	129	See Detail Below
Community Support / Recreational Facilities	30	95	See Detail Below
Radio Repeaters	5	5	
Cell Phone Towers	16	85	
Libraries	1	1	Bath County Library
Other Commercial (Businesses)	192	448	
GRAND TOTAL	9,675	12,591	•

Detail of Federal, State & Local Governments:

AUGUSTA CORRECTIONAL
BATH CO BOARD OF SUPERVISORS
BATH CO COURT HOUSE
BATH CO RECREATION PARK
BATH CO SCHOOL BOARD
BATH CO SERVICE AUTHORITY
BLUE RIDGE PARKWAY
CITY OF BUENA VISTA
COMMONWEALTH OF VIRGINIA
DEPARTMENT OF HIGHWAYS
FAA REGIONAL OFFICE
LAKE ROBERTSON RECREATION
ROCKBRIDGE COUNTY PSA
TOWN OF CRAIGSVILLE
TOWN OF GOSHEN
TOWN OF LEXINGTON
U S CORPS OF ENGINEERS
UNITED STATES FOREST SERVICE
UNITED STATES POST OFFICE
USPS BACOVA POST OFFICE
VIRGINIA GAME COMMISSION

Detail of Community Support / Recreational Facilities

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BATH HIGHLAND VOL FIRE		
BLUE RIDGE MOOSE LODGE		
BOLAR RURITAN CLUB		
BOLAR VOLUNTEER FIRE D		
BOY SCOUTS OF AMERICA		
CAMP ACCOVAC		
CAMP ALKULANA		
CAMP APPALACHIA		
CAMP MONT SHENANDOAH		
EFFINGER VOL FIRE D		
FAIRVIEW COMMUNITY CHURCH		
GRACE BIBLE CAMP		
HOT SPGS FIRE & RESCUE		
MCDOWELL VOL FIRE CO I		
MILLBORO AREA RESCUE S		
MILLBORO MASONIC LODGE		
MILLBORO PRESERVATION		
MILLBORO RURITAN CLUB		
MILLBORO VOL FIRE ASSO		
MT GROVE COMMUNITY CHURCH		
MT GROVE VOL FIRE DEPARTMENT		
PALMER COMMUNITY CE		
ROCKBRIDGE AREA COMM S		
ROCKBRIDGE BATHS VOL FIRE		
ST LUKES EPISCOPAL CHURCH		
VFW POST 4204		
VIRGINIA ELKS YOUTH CAMP		
WILLIAMSVILLE CHURCH		
YOUNG LIFE ROCKBG ALUM		
YOUTH DEVELOPMENT INC		